

## REMARKS

Applicants have studied the Office Action dated October 9, 2003, and have made amendments to the claims. By virtue of this amendment, claims 1-4, 7-9, 11-18, 21-23, 25-32, 35-37, and 39-42 are pending, claims 1-4, 7, 15-18, 21, 29-32, and 35 have been amended, and claims 5-6, 10, 19-20, 24, 33-35, and 38 have been cancelled without prejudice or disclaimer. It is submitted that the application, as amended, is in condition for allowance. Reconsideration and allowance of all of the claims in view of the above amendments and the following remarks are respectfully requested.

Formal drawings were required to be furnished in response to this Office Action. The Applicants respectfully request the requirement for formal drawings be held in abeyance until a notice of allowance is issued in this application. In addition, it is respectfully requested that the Examiner send a copy of the draftsperson response to show the objections to the drawing previously submitted by the applicants.

Claims 1, 15, and 29 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. The Examiner commented the body of the claims does not perform what the preamble set forth (i.e. that claims 1, 15, and 29 provide the use of using a multi-functional customer relationship management tool, but the body of the claims does not). This rejection is respectfully traversed.

Claims 1, 15, and 29 have been amended to recite “creating a plurality of modules for use in the multi-functional customer relationship management tool” (emphasis added). Accordingly, it is respectfully submitted that claims 1, 15, and 29 overcome the 112 problem set forth above. Therefore, the rejection of claims 1, 15, and 29 under 35 U.S.C. § 112, second paragraph should be withdrawn.

Claim 1 was further rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way to enable one skilled in the art to which it pertains to make and/or use the invention. Specifically, the Examiner stated that

claim 1, line 8 was not clear on as to how one having ordinary skill in the art would be able to track customer contacts with a customer. This rejection is respectfully traversed.

Claim 1 (as well as claims 15 and 29) were amended to recite “allow a client representative to review previous customer contacts, product information and servicing information associated with the customer” (emphasis added). Accordingly, it is respectfully submitted that claim 1 overcomes the 112 problem set forth above. Therefore, the rejection of claim 1 under 35 U.S.C. § 112, first paragraph should be withdrawn.

Claims 1-42 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Application Publication No. 2002/0077923 to Siegel et al. (“the Siegel et al. reference”) in view of U.S. Patent Application Publication No. 2003/0061104 to Thomson et al. (“the Thomson et al. reference”). This rejection is respectfully traversed.

Claims 5-6, 10, 19-20, 24, 33-35, and 38 have been cancelled without prejudice or disclaimer. It is respectfully submitted that the rejection under 35 U.S.C. § 103(a) as applied to these claims is now moot and should therefore be withdrawn.

Embodiments of the present invention are directed to an integrated multi-functional management tool using a series of modules to allow different access and manipulations to the customer and product databases over a network for a client representative handling a phone call or email from a customer. Specifically, the present invention provides a tool to better service customers after a product has been purchased by recording all customer contacts, having product information available for answering questions, and providing updates an any service requests such as repairs or returns. Amended independent claim 1 recites “a method for managing customer and product information over a network using a multi-functional customer relationship management tool, comprising ... creating a plurality of modules for use in the multi-functional customer relationship management tool, wherein each module allows specific access and manipulation of the customer and product databases; receiving a contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a client representative to

review previous customer contacts, product information and servicing information associated with the customer; and allowing the client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules” (emphasis added). Independent claims 15 and 29 have been amended to recite similar limitations. Support for the amended claims exists throughout the original specification. For example, page 13, lines 21-24 states: “the CSR, at block 530, then fills out a note field explaining the reason for the call and the resolution for the call, as well as selecting a resolution code from the list stored in the Resolutions Codes 146 field associated with the user.” In addition, page 16, lines 15-16 describe: “the e-mail management module 240 to categorize and respond to emails from a customer 15.” No new matter was added. The Siegel et al. reference nor the Thomson et al. reference disclose, teach or suggest an integrated multi-functional customer relationship management tool using a series of modules to allow different access and manipulations to the customer and product databases to record and respond to incoming telephone calls or emails from customers.

The Siegel et al. reference is directed to a customer/product registration system, which also offers to sell the customer additional products during the registration process. Specifically, the Siegel et al. reference is directed to performing an on-line registration over an open computer network (e.g. the Internet) of an item previously purchased by a customer. After registration, the system is able to provide a list of purchasable items to the registering customer for additional purchase. The Siegel et al. reference explains: “at about the time of making an initial purchase, a customer is often inclined to additionally purchase product upgrades or enhancements, or additional products that can enhance the use and enjoyment of the initially purchased product. The present invention provides a method of performing on-line registration over an open computer network of an item previously purchased by a customer... Upon receiving a completed registration form from the customer, a database is searched to generate a list of purchaseable items. The selection of the list of purchaseable items is based at least in part on the identifier that identifies the purchased item” (See page 1, paragraphs 5 & 6). The Siegel et al. reference focuses on registering customer product purchase information and attempting to make additional

sales while a customer registers through a web page. Nowhere in the cited sections of the Siegel et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of using a multi-functional customer relationship management tool which can be used to handle a contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a client representative to review previous customer contacts, product information and servicing information associated with the customer; and allowing the client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules” (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-4, 7-9, 11-14, 16-18, 21-23, 25-28, 30-32, 35-37, and 39-42) are patentable over the Siegel et al. reference.

The Thomson et al. reference does not make up for the deficiencies of the Siegel reference. The Thomson et al. reference is directed to an electronic warranty administrator that automates the process of coordinating a customer and the servicing of defective products. Specifically, the Thomson et al. reference states in paragraph [0053], [0055], and [0057]: “the electronic warranty administrator then sends the purchaser a welcoming email that includes the warranty administrator’s URL (which will enable the customer to access the warranty administrator’s home page, as displayed in FIG. 17), plus login instructions and a password which will enable the customer to access their personalized home page (FIG. 3) ... when properly identified to the electronic warranty administrator by means of an appropriate log-in and password sequence, the customer 22a receives access to a first database 28. ... Each customer’s personalized portion contains sufficient data about that customer’s purchases and warranty support of those purchases to enable the warranty support and repair services as described herein” (emphasis added). In other words, the Thomson et al. reference is directed using an automated web page to administer warranty issues to alleviate or eliminate personal contacts with the customer. The system in the Thomson et al. references teaches away from creating a customer relationship management tool that helps provide better, more personal customer contact when the customer reaches the client representative through a telephone call or

email. Nowhere in the cited sections of the Thomson et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of a multi-functional customer relationship management tool which can be used to handle a contact from a customer through a telephone call or by an email; accessing at least one of the plurality of modules in the multi-functional customer relationship management tool to allow a client representative to review previous customer contacts, product information and servicing information associated with the customer; and allowing the client representative to update the customer database from information received from the customer to add or modify a specific customer record logging the customer contact and recording any new product or warranty purchase information, service request, return merchandise request, or complaint using one of the plurality of modules” (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-4, 7-9, 11-14, 16-18, 21-23, 25-28, 30-32, 35-37, and 39-42) are patentable over the Thomson et al. reference. In addition, if the Examiner is not persuaded by the above distinctions, the applicants can also swear behind the Thomson et al. reference as needed. Applicants respectfully request notice of such a need by the Examiner.

Claims 2, 16, and 30 are further distinguished over the Siegel et al. and Thomson et al. references. Amended claims 2, 16, and 30 now recite that “wherein the plurality of modules available to the client representative include at least four members of a set of modules comprising a customer interaction module, a return merchandise management module, a warranty administration module, an e-mail module, an inventory management module, a reporting system module and a credit card processing module. Support for the limitations are throughout the specification. No new matter has been added.

It is respectfully submitted that the Siegel et al. and Thomson et al. references do not suggest the limitations of claims 2, 16, and 30. Nowhere in the cited sections of the Siegel et al. and Thomson et al. references disclose, teach or suggest having available at least four modules from the list of possible modules to service the customer. Moreover, even if the Siegel et al. reference and the Thomson et al. reference may disclose a particular module similar in function to one of the claimed modules, one of ordinary skill would not be able to readily combine the various functions into a single multi-functional customer relationship management tool having at

least four modules of support. Accordingly, it is respectfully submitted that amended claims 2, 16, and 30 are further patentable over the Siegel et al. and Thomson et al. references.

Claims 11, 25, and 39 are also further distinguished over the Siegel et al. and Thomson et al. references. Claims 11, 25, and 39 recite that “accessing a return merchandise management module; and producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code” (emphasis added). As described in the specification on page 15, lines 18-22: “by using commercial bar code font to code the RMA number, the repair facility can simply print a bar code label from the return merchandise management module 230 and place it on the returned product.”

It is respectfully submitted that the Siegel et al. and Thomson et al. references do not suggest the limitations of claims 11, 25, and 39. Although the Examiner cited the Thomson et al. reference to describe the use of bar codes to identify products, nowhere in the cited sections of the Siegel et al. and Thomson et al. references disclose, teach or suggest producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code. In fact, a search of the Siegel et al. and the Thomson et al. reference produced no mention of bar codes. Accordingly, it is respectfully submitted that claims 11, 25, and 39 are further patentable over the Siegel et al. and Thomson et al. references.

For all of the above reasons, it is respectfully submitted that the rejection of claims 1-42 under 35 U.S.C § 103(a) should be withdrawn.

Therefore, in light of the above remarks, it is respectfully submitted that claims 1-4, 7-9, 11-18, 21-23, 25-32, 35-37, and 39-42 are in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Northridge, California, telephone number (818) 576-4110, to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,

Dated: 3 / 1 / 04

By: Richard K. Yoon  
Richard K. Yoon  
Reg. No. 42,247